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Attorneys for Defendant Prometheus Global Media, LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

PENSKE MEDIA CORPORATION,
dba PMC, a Delaware corporation,

Plaintiff,

v.

PROMETHEUS GLOBAL MEDIA,
LLC, a Delaware limited liability
company d/b/a hollywoodreporter.com;
and DOES 1 through 10, inclusive,

Defendants.

CASE NO. CV11-7560-JST (MRW)

Hon. Josephine Staton Tucker

**JOINT STIPULATION TO
EXTEND CASE
MANAGEMENT DATES**

[PROPOSED] ORDER
LODGED CONCURRENTLY
HEREWITH

Plaintiff Penske Media Corporation ("Penske") and Defendant Prometheus
Global Media, LLC ("Prometheus") (collectively, the "Parties"), by and through
their counsel, hereby stipulate as follows:

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1 WHEREAS, the Court issued a Scheduling and Case Management Order on
2 January 31, 2012 (Hon. Valerie Baker Fairbank, presiding);

3 WHEREAS, the Parties timely engaged in mediation before the Hon.
4 Patricia Collins (ret.) on July 17, 2012;

5 WHEREAS, the Parties were encouraged by the progress made at the
6 mediation before Judge Collins and have been engaged in ongoing settlement
7 discussions still involving Judge Collins on a regular basis since the mediation,
8 including frequent email and telephone communications with Judge Collins, which
9 the Parties invite the Court to confirm with Judge Collins;

10 WHEREAS, the Parties are committed to continuing to work intensively and
11 in good faith with Judge Collins and one another, including the possibility of an
12 additional face to face mediation before Judge Collins in the near future;

13 WHEREAS, the Parties have propounded written and deposition discovery;

14 WHEREAS, the Parties have met and conferred regarding certain discovery
15 propounded by Plaintiff and Defendant and have reached an impasse that likely
16 will require motion practice;

17 WHEREAS, Defendant has asserted that the potential damages available to
18 Plaintiff do not justify the cost of litigation, including the cost of the extensive
19 anticipated discovery motion practice;

20 WHEREAS, the Parties are entering into this Stipulation in an attempt to
21 avoid unnecessary discovery motion practice, especially in light of the fact that the
22 Parties are attempting to resolve their disputes through continuing discussions with
23 Judge Collins;

24 WHEREAS, Penske and Prometheus have accordingly agreed that:

25 IT IS HEREBY STIPULATED and agreed to by and among the Parties that
26 the case management dates be continued by four months, and revised as follows:

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	Current Date	Revised Date
Fact discovery cut-off	Nov. 9, 2012	Mar 11, 2013
Initial expert disclosure	Dec. 9, 2012	Apr. 9, 2013
Rebuttal expert disclosures	Jan. 9, 2013	May 9, 2013
Expert witness discovery	Feb. 9, 2013	June 10, 2013
Settlement conference	May 17, 2013	Sept. 13, 2013
Motion cut-off	May 20, 2013	Sept. 16, 2013
Final pretrial conference	June 28, 2013 (1:30 pm)	Oct. 25, 2013 (1:30 pm)
Exhibit conference	July 12, 2013 (3:00 pm)	Nov. 15, 2013 (3:00 pm)
Jury trial	July 16, 2013 (9:00 am)	Nov. 19, 2013 (9:00 am)

DATED: November 9, 2012

FREEDMAN & TAITELMAN, LLP

By: /s/ Bryan J. Freedman
Attorneys for Plaintiff
PENSKE MEDIA CORPORATION

DATED: November 9, 2012

SAUER & WAGNER LLP

By: /s/ Eve H. Wagner
Attorneys for Defendant
PROMETHEUS GLOBAL MEDIA, LLC

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1 I hereby attest that the concurrence in the filing of this document had been
2 obtained for all signatures indicated by a "conformed" signature (/s/) within this e-
3 filed document.

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5 DATED: November 9, 2012

SAUER & WAGNER, LLP

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7 By: /s/ Eve H. Wagner

8 Attorneys for Defendant
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